

Steptoe

The Honorable Jan E. DuBois  
September 23, 2020  
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September 23, 2020

The Honorable Jan E. DuBois  
United States District Court  
for the Eastern District of Pennsylvania  
United States Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: ***Eddystone Rail Company, LLC v. Bridger Logistics, LLC, et al.***  
**Civil Action No. 2:17-cv-00495**

Dear Judge DuBois:

On behalf of the Plaintiff Eddystone Rail Company LLC, we write to seek leave to file an omnibus brief that responds to the motion to compel and for sanctions filed by Defendants Rios and Gamboa (Dkts. 401, 403) and the motion for sanctions filed by Defendants Bridger Logistics, LLC, Ferrellgas Partners, L.P. and Ferrellgas, L.P. (Dkt. No. 405). This omnibus brief would also include Eddystone's reply in further support of its motion for protective order (Dkt. 395), in order to respond to arguments made by Defendants in their opposition briefs to the motion for protective order. (Dkts. 404, 406). We believe the proposed omnibus brief is the most efficient and convenient way to facilitate the briefing for the Court's review.

If this proposal is permitted, Eddystone respectfully requests that the Court set an October 6, 2020 deadline for the omnibus brief. We have consulted with counsel for Defendants, who have advised that they consent to the October 6, 2020 date for the omnibus brief. Counsel for Rios and Gamboa have advised that they will seek leave to file a reply in support of their motion to compel and for sanctions on or before October 13, 2020. Eddystone has no objection to that anticipated request. Of course, we are available to discuss these matters over the phone if it would be helpful to the Court.

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Respectfully,

/s/

Steven J. Barber